

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JACQUELYN SCHREIER,) Civil Action No.: 2:19-cv-04867-WFK-LB
)
Plaintiff,)
)
vs.)
)
PROFESSIONAL CLAIMS BUREAU, INC.)
)
Defendant.)
)

**DECLARATION OF PLAINTIFF'S ATTORNEY DANIEL ZEMEL IN SUPPORT OF
PLAINTIFF'S APPLICATION FOR ATTORNEY'S FEES AND COSTS**

Under 28 U.S.C. § 1746, I, Elizabeth Apostola, do hereby declare under penalty of perjury, that the following is true and correct:

1. I submit this Declaration in support of Plaintiff Jacquelyn Schreier's request for an award of attorney fees, costs and disbursements incurred in litigating this case.
2. My rate for this matter is \$400 per hour. I base this figure on the following:
3. I graduated from New England School of Law in May 2006.
4. I have been practicing law for approximately 13 years with experience in complex civil litigation and personal injury defense litigation, as well as FDCPA and FCRA litigation for the last three years.

5. I am a member in good standing of the bars of New York, Massachusetts, and Alaska.¹

6. I have worked on over two hundred and fifty (250) cases in the area of consumer protection law involving matters under the Fair Debt Collection Practices Act and the Fair Credit Reporting Act.

7. I am a member in good standing in numerous federal district and appellate courts including:

- A. Southern District of New York
- B. Eastern District of New York
- C. Northern District of Illinois
- D. District of Alaska
- E. District of Massachusetts

8. I have been certified as Class Counsel in the following cases:

- A. *Del Carmen v. R.A. Rogers*, No. 5:16-cv-00971, (W.D. Tx 2018)
- B. *Williams v. Global Credit & Collections et al.*, No. 1:17-cv-03323 (N.D.I.L. 2018).
- C. *O'Dell v. National Recovery Agency*, 291 F. Supp. 3d 687 (E.D. Pa. 2018)
- D. *Williams v. Frontline Asset Strategies et al.*, No. 2:17-cv-03119, (E.D. Pa. 2019).

9. I was counsel in *O'Dell v. National Recovery Agency*, 291 F. Supp. 3d 687 (E.D. Pa. 2018), a reported decision.

¹ Upon leaving Alaska, due to the high mandatory Alaska bar costs, I switched to “Inactive” status, but still pay yearly dues to maintain this status in good standing.

10. I have been counsel on numerous unreported decisions including but not limited to:

Carmen v. R.A. Rogers, Inc., 2018 U.S. Dist. LEXIS 174461 (W.D. Tex. Apr. 25, 2018); *Carmen v. R.A. Rogers, Inc.*, 2018 U.S. Dist. LEXIS 173935 (W.D. Tex. June 13, 2018); *Myers v. Wells Fargo Bank*, 2020 U.S. Dist. LEXIS 20230 (S.D. Ohio Feb. 6, 2020); *Konig v. Transunion*, 2020 U.S. Dist. LEXIS 20794 (S.D.N.Y. Feb. 4, 2020); *Friedman v. Citimortgage, Inc.*, 2019 U.S. Dist. LEXIS 149706 (S.D.N.Y. Sep. 3, 2019).

11. On the attached affidavit of time and expense, I have delineated the time and work I put in this matter.

In accordance with 28 U.S.C. §1746, I, Elizabeth Apostola, do hereby certify under penalties of perjury, that the above statements are true and correct to the extent they reflect my personal knowledge and otherwise are based upon my information and belief.

Dated: March 06, 2020

/s/ Elizabeth Apostola
Elizabeth Apostola, Esq.